THE HONORABLE BARBARA J. ROTHSTEIN 1 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT TACOMA ORBRIDGE LLC, 9 No. 3:20-cv-06259-BJR 10 Plaintiff, STIPULATED MOTION FOR EXTENSION OF TIME TO ANSWER 11 v. OR OTHERWISE RESPOND 12 SAFARI LEGACY, INC. and PRATIK PATEL, 13 Defendants. 14 15 Pursuant to Local Civil Rules 7(d)(1) and 10(g), Defendants Safari Legacy, Inc. and 16 Pratik Patel ("Defendants") file this Stipulated Motion to Extend Time to Answer or Otherwise 17 Respond to Plaintiff's Original Complaint in this civil action, and state as follows: 18 1. On December 31, 2020, Plaintiff filed its Original Complaint in this action, 19 alleging (1) breach of contract and (2) improper use of confidential information against 20 Defendants. 21 2. Defendants do not waive and hereby expressly reserve defenses based on (1) 22 personal jurisdiction and (2) venue, and to bring a Fed. R. Civ. P. 12 motion based on the 23 same. 24 CORR CRONIN LLP STIPULATED MOTION FOR EXTENSION OF TIME 1001 Fourth Avenue, Suite 3900 TO ANSWER OR OTHERWISE RESPOND-Page 1 Seattle, Washington 98154-1051

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	3.	Defendant Safari Legacy was serv	ved with process on J	January 20, 2021, making		
11	its answer due on February 10, 2021. Defendant Pratik Patel has not been served with process, but agrees to waive service pursuant to Fed. R. Civ. P. 4(d), while not waiving and					
- 11 '						
	expressly reserving any defense based on personal jurisdiction or venue. See Fed. R. Civ. P.					
	4(d)(5).					
	4. Defendants request that they be given an extension of thirty (30) days to					
	answer or otherwise respond to Plaintiff's Original Complaint, making its answer or responsive pleading due on March 12, 2021. Rodney Gould, counsel for Plaintiff, agreed to					
1	this thirty day					
	Stipul	Stipulated and agreed to this 3rd day of February, 2021.				
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1 **ORDER** 2 This Court has considered the parties' Stipulated Motion to Extend Time to Answer or 3 Otherwise Respond to Plaintiff's Original Complaint. Finding good cause therefore, the Court 4 ORDERS that the deadline to file an answer or responsive pleading is extended to March 12, 5 2021. 6 IT IS SO ORDERED. 7 DATED this 3rd day of February 2021. 8 9 10 Barbara Jacobs Rothstein 11 U.S. District Court Judge 12 13 14 Presented by: 15 16 CORR CRONIN LLP 17 18 s/ Lucio E. Maldonado Lucio E. Maldonado, WSBA No. 54279 19 1001 Fourth Avenue, Suite 3900 Seattle, WA 98154-1051 20 (206) 625-8600 Phone; lmaldonado@corrcronin.com 21 22 23 24 CORR CRONIN LLP

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